

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

BETTY HEARD, <i>et al.</i> ,	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. H-15-2261
	§	
AASHU LLC, <i>et al.</i> ,	§	
Defendants.	§	

**PLAINTIFFS' FIRST SUPPLEMENTAL WITNESS LIST**

Plaintiffs submit the following trial witness list:

1.     Betty Heard (WILL CALL)  
c/o Nicholas J. Wagoner  
WAGONER LAW FIRM  
2855 Mangum Road, Suite 534  
Houston, TX 77092

Betty Heard is a plaintiff who may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

2.     Stanley Griggs (WILL CALL)  
c/o Nicholas J. Wagoner  
WAGONER LAW FIRM  
2855 Mangum Road, Suite 534  
Houston, TX 77092

Stanley Griggs is a plaintiff who may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

3.     Daisy Sanchez (WILL CALL)  
c/o Nicholas J. Wagoner  
WAGONER LAW FIRM  
2855 Mangum Road, Suite 534  
Houston, TX 77092

Daisy Sanchez is a plaintiff who may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

4. Maria Basa (WILL CALL)  
c/o Nicholas J. Wagoner  
WAGONER LAW FIRM  
2855 Mangum Road, Suite 534  
Houston, TX 77092

Maria Basa is a plaintiff who may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

5. Nicholas J. Wagoner (WILL CALL)  
WAGONER LAW FIRM  
2855 Mangum Road, Suite 534  
Houston, TX 77092

Mr. Wagoner is the attorney-in-charge for the Plaintiffs in this case. In the event that Plaintiffs prevail on one or more of their claims at trial, Mr. Wagoner will testify on the topic of reasonable attorney's fees.

6. Asif Ali (WILL CALL)  
c/o G. Scott Fiddler  
FIDDLER & ASSOCIATES, P.C.  
1004 Congress, 3rd Floor  
Houston, Texas 77002

Asif Ali is an individual defendant in the above-styled lawsuit as well as the owner, president, director, and registered agent of Defendant Aashu L.L.C. He may testify about the facts surrounding the incidents that form the basis of this lawsuit.

7. Aamir Ali (WILL CALL)  
c/o Peter Costea  
LAW OFFICE OF PETER COSTEA  
2603 Augusta, Suite 880  
Houston, Texas 77057

Aamir Ali is an individual defendant in the above-styled lawsuit. He is a manager at the Avalon Cleaners store at which each plaintiff worked. He may testify about the facts surrounding the incidents that form the basis of this lawsuit.

8. Zulfiqar Ali (WILL CALL)  
c/o Peter Costea

LAW OFFICE OF PETER COSTEA  
2603 Augusta, Suite 880  
Houston, Texas 77057

Zulfiqar Ali is an individual defendant in the above-styled lawsuit as well as a partial owner, president, treasurer, secretary, and registered agent of Defendant ABZZ Corporation d.b.a. Avalon Cleaners, America Cleaners, Ritz Cleaners, 2000 Cleaners, and Century Cleaners, among other assumed names. He may testify about the facts surrounding the incidents that form the basis of this lawsuit.

9. Barkat Ali (MAY CALL)  
1407 Sunclair Park Ln  
Sugar Land, TX 77479-5363

Barkat Ali is Asif Ali's father and business partner. He is also a partial owner and vice of Defendant ABZZ Corp. He may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

10. Chantral Heard (MAY CALL)  
5804 Roberts Road  
Katy, Texas 77494

Chantral Heard is the daughter of Plaintiff Betty Heard. Chantral Heard drove Betty Heard to and from work during the relevant period. She may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

11. Marvin Grant (MAY CALL)  
6100 Clarkson Lane  
Houston, Texas 77055

Marvin Grant is the brother-in-law of Plaintiff Betty Heard. Mr. Grant drove Betty Heard to and from work during the relevant period. He may testify about the facts surrounding the alleged incidents that form the basis of this lawsuit.

12. Leslie Maderer (MAY CALL)  
3806 Highway 36 North  
Bellville, Texas 77418

Leslie Maderer was a salesman employed by Gulf States Laundry Machinery Co. who regularly made sales calls to Avalon Cleaners' cleaning plant at

which Plaintiffs worked, and ordered cleaning supplies for Defendants' business. Mr. Maderer has personal knowledge of, and may testify about, the times at which Plaintiffs were present at work in the mornings and afternoons when he made sales calls to Avalon Cleaners; equipment and supplies that Avalon Cleaners ordered; and other facts relevant to the issues in this case. He may testify about each of these matters.

13. All witnesses listed in Defendants' respective witness lists. (MAY CALL)
14. All records custodians. (MAY CALL)
15. Impeachment witnesses. (MAY CALL)
16. Rebuttal witnesses. (MAY CALL)

Respectfully submitted,

WAGONER LAW FIRM



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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, and notice was electronically provided to the following CM/ECF system participants:

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